1 2 3 4 5 6	RUSSELL E,. MARSH, ESQUIRE Nevada Bar No. 11198 WRIGHT MARSH & LEVY 300 S. Fourth Street Suite 701 Las Vegas, NV 89101 (702) 382-4004 (702) 382-4800 (Fax) russ@wmllawlv.com Attorneys for Darrell Glen Harris
7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA
8	
9	UNITED STATES OF AMERICA,) CASE NO. 2:23-CR-000113-CDS-NJK
10	Plaintiff,
11	vs.
12	DARRELL GLEN HARRIS,
13	Defendant,
14	MOTION TO ALLOW DEFENDANT HARRIS
15	TO TRAVEL TO ARIZONA
16	DARRELL GLEN HARRIS, by and through his counsel, RUSSELL E. MARSH, ESQUIRE,
17	respectfully moves this Honorable Court to allow the conditions of Mr. Harris's Pretrial Release be
18	modified to allow him to travel to Arizona from July 3-6, 2023, for a family trip.
19	1. On June 20, 2023, Mr. Harris was indicted in this case. (ECF No. 2.) Mr. Harris was
20	arrested and appeared for initial appearance and arraignment on June 21, 2023. (ECF No. 14.) Mr.
21	Harris was released on certain conditions, and his travel was restricted to California with travel to
22	Nevada for court and attorney visits only. (ECF 29 at 3.)
23	2, Mr. Harris's trial in this matter is currently set for August 21, 2023 (ECF No. 14),
24	though this date will likely be continued.
25	3. Mr. Harris would like to travel to Arizona for a previously planned family trip. He
26	booked and paid for a short-term rental house in Lake Havasu, Arizona, three months ago, before
27	the present charges were brought. He plans to travel from July 3-6, 2023, with his mother, three of
28	his children, and the children's mother.

Case 2:23-cr-00113-CDS-NJK Document 40 Filed 06/29/23 Page 2 of 3

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- 4. Counsel for Mr. Harris contacted Pretrial Services in Nevada and spoke with Pretrial Officer Emily McKilip. Ms. McKilip told counsel that her office would not oppose this travel request, so long as they received a copy of the itinerary, which as been provided.
- 5. Counsel also spoke with the prosecutor on this case, AUSA Joshua Brister, and he stated that the government takes no position regarding this motion.
- 6. Mr. Harris agrees that all other conditions of his release will remain in full force and effect. Mr. Harris has attached a proposed Order for the Court's convenience.

Dated this 28th day of June, 2023.

Respectfully submitted,

WRIGHT MARSH & LEVY

BY /s/ Russell E. Marsh
RUSSELL E. MARSH
Attorneys for Defendant Harris

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA UNITED STATES OF AMERICA, CASE NO. 2:23-CR-000113-CDS-NJK Plaintiff, VS. DARRELL GLEN HARRIS, Defendant, **ORDER** Based on the Motion filed by the Defendant, Darrell Glen Harris, and good cause appearing, IT IS HEREBY ORDERED that the conditions of Mr. Harris's pretrial release be modified to allow him to travel from California to Lake Havasu, Arizona, for a family trip from July 3-6, 2023. All other conditions of Pretrial Supervision remain in effect. IT IS SO ORDERED. JUNE 29, 2023 Dated: DANIEL J. ALBREGTS UNITED STATES MACISTRATE JUDGE

Case 2:23-cr-00113-CDS-NJK Document 40 Filed 06/29/23 Page 3 of 3